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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO,  
S. DE R.L. DE C.V., *et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY  
AND IN HIS CAPACITY AS FOREIGN  
REPRESENTATIVE OF PERFORADORA  
ORO NEGRO, S. DE R.L. DE C.V. AND  
INTEGRADORA DE SERVICIOS  
PETROLEROS ORO NEGRO, S.A.P.I. DE  
C.V.

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL  
PARTNERS, LLC; AMA CAPITAL

BK Case No. 18-11094 (SCC)  
(Jointly Administered) (Chapter 15)

Adversary Case No. 19-01294 (SCC)

PARTNERS, LLC; ANDRES  
CONSTANTIN ANTONIUS-GONZÁLEZ;  
ASIA RESEARCH AND CAPITAL  
MANAGEMENT LTD.; CQS (UK) LLP;  
FINTECH ADVISORY, INC.; DEUTSCHE  
BANK MÉXICO, S.A.; INSTITUCIÓN DE  
BANCA MÚLTIPLE; GARCÍA  
GONZÁLEZ Y BARRADAS ABOGADOS,  
S.C.; GHL INVESTMENTS (EUROPE)  
LTD.; JOHN FREDRIKSEN; KRISTAN  
BODDEN; MARITIME FINANCE  
COMPANY LTD.; NOEL BLAIR HUNTER  
COCHRANE, JR; ORO NEGRO PRIMUS  
PTE., LTD.; ORO NEGRO LAURUS PTE.,  
LTD.; ORO NEGRO FORTIUS PTE., LTD.;  
ORO NEGRO DECUS PTE., LTD.; ORO  
NEGRO IMPETUS PTE., LTD.; PAUL  
MATISON LEAND, JR.; ROGER ALAN  
BARTLETT; ROGER ARNOLD  
HANCOCK; SEADRILL LIMITED; SHIP  
FINANCE INTERNATIONAL LTD.; and  
DOES 1-100

Defendants.

**DECLARATION OF DANIEL PULECIO-BOEK**

I, Daniel Pulecio-Boek, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, counsel of record for Fernando Perez Correa Camarena, the Foreign Representative of Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de C.V. in this action.

2. I am a member in good standing of the State Bar of New York, and I am admitted to practice in this Court.

3. I respectfully submit this declaration in support of the *Motion for an Order Authorizing Alternative Service on Defendants Deutsche Bank México, S.A. and Andres Antonius.*

4. From June 11 to 29, 2019, I delivered the Summons and Complaint to Defendants, including Antonius via email, text message, WhatsApp and Facebook Messenger, and Deutsche via email.<sup>1</sup>

5. Exhibit 1 is a true and correct copy of an email chain dated from June 11, 2019 to June 12, 2019 regarding service of the Summons and Complaint on the Ad Hoc Group.<sup>2</sup>

6. Exhibit 2 is a true and correct copy of the June 25, 2019 email indicating that the Ad-Hoc Group's counsel would accept service on behalf of all members of the Ad Hoc Group, but not on behalf of Antonius.

7. Exhibit 3 is a true and correct copy of an email chain dated from June 13, 2019 to June 24, 2019 regarding service of the Summons and Complaint on the Singapore Rig Owners.

8. Exhibit 4 is a true and correct copy of an email dated June 14, 2019 to counsel for Seadrill and Fintech enclosing the Summons and Complaint.

9. Exhibit 5 is a true and correct copy of an email chain dated from June 18, 2019 to June 24, 2019 regarding service of the Summons and Complaint on Seadrill and Fintech.

10. Exhibit 6 is a true and correct copy of an email chain dated from June 11, 2019 to October 10, 2019 regarding service of Deutsche.

11. Exhibit 7(a) is a true and correct copy of an email dated June 28, 2019 to Juan Oberhauser and Isabel Ocana attaching the Summons and Complaint.

12. Exhibit 7(b) is a true and correct copy of an email dated June 28, 2019 to Gerardo Sainz and Gabriel Arroyo attaching the Summons and Complaint.

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<sup>1</sup> In order to limit the number of exhibits, this declaration does not attach all communications sent to, and delivery confirmations received from, those individuals and entities who have since accepted service. Additionally, I do not attach the communications sent to, and delivery confirmations received from, Defendant García González y Barradas Abogados, S.C.

<sup>2</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the motion and the Complaint.

13. Exhibit 7(c) is a read receipt from Juan Oberhauser dated June 28, 2019.
14. Exhibit 7(d) is a read receipt from Gerardo Sainz dated June 28, 2019.
15. Exhibit 7(e) is a read receipt from Gabriel Arroyo dated June 29, 2019.
16. Exhibit 8(a) is a true and correct copy of a screenshot of the Facebook message sent to Antonius on June 23, 2019.
17. Exhibit 8(b) is a true and correct copy of the email sent June 23, 2019 to Antonius and the delivery confirmation for the same.
18. Exhibit 8(c) is a true and correct copy of a screenshot of the WhatsApp chat with Antonius dated June 23, 2019, showing delivery and receipt of the Summons and Complaint.
19. Exhibit 8(d) is a true and correct copy of a screenshot of the text message sent to Antonius dated June 23, 2019 and showing delivery of the Summons and Complaint.

20. Exhibit 9 is a true and correct copy of [REDACTED]

21. Exhibit 10 is a true and correct copy of [REDACTED]

22. Exhibit 11 is a true and correct copy of [REDACTED]

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<sup>3</sup> Redactions are in accordance with the governing protective order in the underlying Chapter 15 proceeding. *See In re Perforadora Oro Negro, S. de R.L. de C.V., et al.*, No. 18-11094 (Bankr. S.D.N.Y.) (SCC) (Jointly Administered), ECF 169.

Dated: October 10, 2019



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